

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

B.D. COOKE & PARTNERS LIMITED, AS
ASSIGNEE OF CITIZENS CASUALTY COMPANY
OF NEW YORK (IN LIQUIDATION),

Plaintiff,

-against-

CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON,

Defendants.

Civil Action No. 08-CIV-3435 (RJH)

**NOTICE OF MOTION FOR
ADMISSION OF COUNSEL
PRO HAC VICE**

PLEASE TAKE NOTICE that, upon the annexed affidavit of John Finnegan, sworn to May 7, 2008 and the exhibits thereto, and upon all pleadings and proceedings heretofore had herein, the undersigned will move this Court before the Honorable Richard J. Holwell, at the United States Court House, 500 Pearl Street, Courtroom 17B, New York, New York, on a date to be determined by the Court, for an order, pursuant to Local Civil Rule 1.3(c), admitting Carey G. Child of the law firm of Chadbourne & Parke LLP pro hac vice for the purpose of representing plaintiff B.D. Cooke & Partners Limited in the above-captioned action.

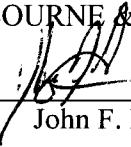
PLEASE TAKE FURTHER NOTICE that plaintiff waives oral argument on this motion unless defendant serves papers in opposition in which case oral argument is respectfully requested. Defendants did not oppose the admission of Carey G. Child pro hac vice in the related state action and have not indicated they intend to oppose admission in the above-captioned action.

MAY 09 2008

PL 925-650274

Dated: New York, New York
May 7, 2008

CHADBOURNE & PARKE LLP

By 

John F. Finnegan

30 Rockefeller Plaza
New York, New York 10112
(212) 408-5100
and
1200 New Hampshire Avenue, N.W.
Suite 300
Washington, D.C. 20036
(202) 974-5600

Attorneys for Plaintiff

TO: James Veach, Esq.
MOUND COTTON WOLLAN & GREENGRASS
Attorneys for Defendant
One Battery Park Plaza
24 Whitehall Street
New York, NY 10004

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

B.D. COOKE & PARTNERS LIMITED, AS
ASSIGNEE OF CITIZENS CASUALTY COMPANY
OF NEW YORK (IN LIQUIDATION),

Plaintiff,

-against-

CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON,

Defendants.

Civil Action No. 08-CIV-3435 (RJH)

**AFFIDAVIT OF JOHN
FINNEGAN IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)
)
 :
County of New York) ss.:

JOHN FINNEGAN, being duly sworn, deposes and says:

1. I am a partner in Chadbourne & Parke LLP, attorneys for B.D. Cooke & Partners Limited ("B.D. Cooke"), plaintiff in the above-captioned action. I make this affidavit in support of plaintiff's motion for an order, pursuant to Local Civil Rule 1.3(c), admitting Carey G. Child pro hac vice for the purpose of representing B.D. Cooke in this action. An affidavit of Mr. Child in support of this motion is attached hereto as Exhibit A.

2. Mr. Child is a partner in Chadbourne & Parke LLP and is resident in the firm's Washington, D.C. office. He is a member in good standing of the Bars of the District of Columbia and the Commonwealth of Virginia. His Certificates of Good Standing from these

jurisdictions are attached hereto as Exhibit B. I have known Mr. Child for more than one year and can attest based upon experience that he is of the highest moral character and fitness.

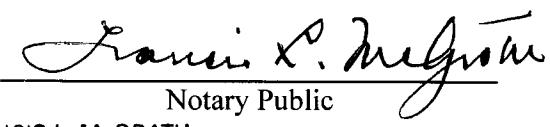
3. Mr. Child concentrates in insurance and reinsurance litigation and arbitration. The experience of Mr. Child, along with his knowledge of the facts at issue in this case, are critical to the representation of B.D. Cooke and B.D. Cooke would be prejudiced if Mr. Child was not allowed to appear pro hac vice. B.D. Cooke has requested that Mr. Child assist in Chadbourne's representation of the plaintiff in this action.

WHEREFORE, I respectfully request that this Court admit Carey G. Child of Chadbourne & Parke LLP, Washington, D.C., pro hac vice for the purpose of representing plaintiff in the above-captioned action. A proposed form of Order is attached hereto as Exhibit C.



John Finnegan

Sworn to before me this
7th day of May, 2008.


Notary Public

FRANCIS L. MCGRATH
Notary Public, State of New York
No. 01MC5062702
Qualified in New York County
Commission Expires ~~July 1, 1998~~

August 16, 2010

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

B.D. COOKE & PARTNERS LIMITED, AS
ASSIGNEE OF CITIZENS CASUALTY COMPANY
OF NEW YORK (IN LIQUIDATION),

Plaintiff,

-against-

CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON,

Defendants.

Civil Action No. 08-CIV-3435 (RJH)

**AFFIDAVIT OF CAREY C.
CHILD IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

District of Columbia)
)
 :
City of Washington) ss.:

CAREY G. CHILD, being duly sworn, deposes and says:

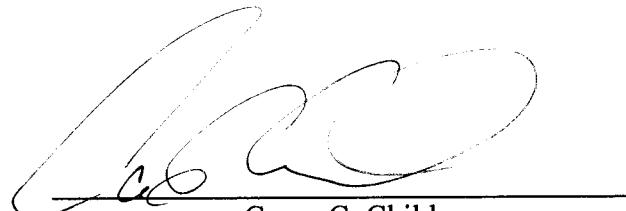
1. I am a partner at the law firm of Chadbourne & Parke LLP ("Chadbourne"), attorneys of record for B.D. Cooke & Partners Limited ("B.D. Cooke") the plaintiff in the above-captioned action. I have been a partner at Chadbourne since 2001 and was associated with the firm from 1992 to 2001. I am resident in Chadbourne's Washington, D.C. office. I make this affidavit in support of the motion for my admission pro hac vice for the purpose of representing B.D. Cooke in all phases of this action.

2. I concentrate in insurance and reinsurance litigation and arbitration. I am a member in good standing of the bars of the District of Columbia and the Commonwealth of Virginia. I have neither been suspended nor disbarred by any court. There are not now, nor have there ever been, any disciplinary proceedings against me in any jurisdiction.

3. There has been an ongoing attorney-client relationship between B.D. Cooke and Chadbourne. B.D. Cooke has requested that I represent it in this action. I represented B.D. Cooke in a substantially similar matter and, as such, am uniquely familiar with the issues that are the subject of this proceeding.

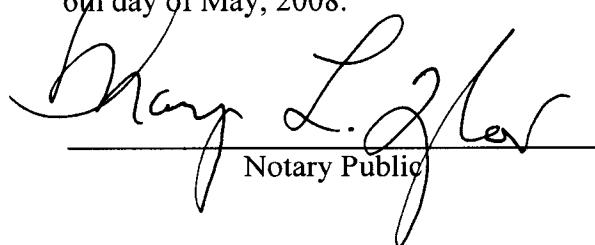
4. For the foregoing reasons, I respectfully request that I be admitted pro hac vice to this Court for the purpose of representing B.D. Cooke in connection with the above-captioned action.

Dated: Washington, D.C.
May 6, 2008



Carey C. Child

Sworn to before me this
6th day of May, 2008.



Mary L. Taylor
Notary Public

District of Columbia: SS

Subscribed and Sworn to before me, in my presence,

this 6 day of May, 2008

Mary L. Taylor

(Notary Public, D.C.)

My commission expires 04/14/11

Mary L. Taylor
Notary Public District of Columbia
My Commission Expires 04/14/11



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

CAREY G. CHILD

was on the 14th day of MAY, 1993,
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on May 7,
2008.

GARLAND PINKSTON, JR., CLERK

By: *Patrick Foye*
Deputy Clerk



VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT CAREY GLENN CHILD IS AN ASSOCIATE MEMBER OF THE VIRGINIA STATE BAR
IN GOOD STANDING. MR. CHILD WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON OCTOBER 1, 1992, AFTER
SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

Issued May 8, 2008



Karen A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ASSIGNEE OF CITIZENS CASUALTY COMPANY
OF NEW YORK (IN LIQUIDATION),

Plaintiff,

-against-

CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON,

Defendants.

Civil Action No. 08-CIV-3435 (RJH)

**ORDER ADMITTING
CAREY G. CHILD PRO HAC
VICE ON WRITTEN MOTION**

THIS MATTER having been brought before the Court by John Finnegan,
attorney for B.D. Cooke & Partners Limited, as Assignee of Citizens Casualty Company
of New York (In Liquidation), and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

Carey G. Child
Chadbourne & Parke LLP
1200 New Hampshire Avenue, NW
Washington, DC 20036
(202) 974-5600
(202) 974-5602 (fax)

is admitted to practice pro hac vice as counsel for Plaintiff B.D. Cooke & Partners Limited, as
Assignee of Citizens Casualty Company of New York (In Liquidation), in the above-captioned
case in the United States District Court for the Southern District of New York. All attorneys
appearing before this Court are subject to the Local Rules of this Court, including the Rules
governing discipline of attorneys. This action has been assigned to the Electronic Case Filing

(ECF) system; as such, Mr. Child shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: May ____, 2008
New York, New York

Judge Richard J. Holwell

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

B.D. COOKE & PARTNERS LIMITED, AS
ASSIGNEE OF CITIZENS CASUALTY COMPANY
OF NEW YORK (IN LIQUIDATION),

Civil Action No. 08-CIV-3435 (RJH)

Plaintiff,

-against-

CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON,

**AFFIDAVIT OF SERVICE
PURSUANT TO LOCAL CIVIL
RULES 5.3 and 6.1**

Defendants.

State of New York)
)
 :
County of New York) ss.:
)

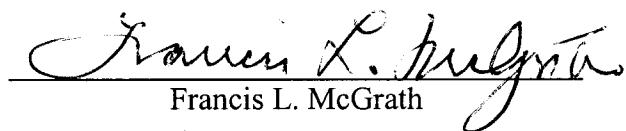
Francis L. McGrath, being duly sworn, hereby deposes and says:

1. I am in the employ of CHADBOURNE & PARKE LLP, attorneys for plaintiffs herein.
2. I am over the age of eighteen years and am not a party to this action.
3. On the 9th day of May, 2008, I served the Plaintiffs' Motion for Admission of Carey G. Child Pro Hac Vice filed in this action upon Defendant by depositing a true copy thereof securely in a post-paid wrapper for overnight delivery via Federal Express to:

James Veach

Mound Cotton Wollan & Greengrass
One Battery Park Plaza
New York, NY 100041486

4. The Federal Express package in which both items were enclosed bore
the tracking number 8213 4759 7632.



Francis L. McGrath

Sworn to before me this
9th day of May, 2008.



Kade Coute
Notary Public

KADE COUTAIN
Notary Public, State of New York
No. 01CO6036928
Qualified in Bronx County
Certificate Filed in New York County
Commission Expires Feb. 14, 2010